

Ronald D. Foreman (SBN 61148)
FOREMAN & BRASSO
930 Montgomery Street, Suite 600
San Francisco, CA 94133
Telephone: (415) 433-3475
Facsimile: (415) 781-8030
Email: foremanandbrasso@foremanandbrasso.com

Attorneys for Defendant
MICHAEL T. BLATT.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**LIBERTY MUTUAL INSURANCE
COMPANY,**

Plaintiff,

v.

MICHAEL T. BLATT,

Defendant.

Case No. C06-2022 SC

**STIPULATION TO WITHDRAW
THE MOTION OF A
DISCOVERY DISPUTE AND
STIPULATION FOR ORDER
THAT DEFENDANTS
AUTOMATIC ADMISSIONS ARE
DEEMED WITHDRAWN AND
THE RESPONSES TO REQUEST
TO ADMIT NO.'S 1-14 SERVED
ON OCTOBER 4, 2007 ARE
DEEMED OPERATIVE.**

Local Rule 37-1

Trial Date: November 19, 2007

I, Ronald D. Foreman, declare that if called to testify in this matter that I would
testify as hereinafter stated:

1. I am the attorney for defendant Michael T. Blatt.
2. By stipulated to application, the parties submitted a discovery dispute to the
Court concerning Relief From Admissions.
3. Good cause exists for the granting of this Stipulation For an Order to

**STIPULATION TO WITHDRAW THE MOTION OF A DISCOVERY DISPUTE AND STIPULATION FOR
ORDER THAT DEFENDANTS AUTOMATIC ADMISSIONS ARE DEEMED WITHDRAWN AND THE
RESPONSES TO REQUEST TO ADMIT NO.'S 1-14 SERVED ON OCTOBER 4, 2007 ARE DEEMED
OPERATIVE.**

1 Withdraw The Motion of a Discovery Dispute and Stipulation For an Order That
2 Defendant's Automatic Admissions Are Deemed Withdrawn and The Responses to Request
3 to Admit No.'s 1-14 Served On October 4, 2007 Are Deemed Operative. The parties have
4 met and conferred regarding defendant's responses to plaintiff's Request For Admissions in
5 several conference calls conducted over the last several days. The parties have resolved their
6 dispute *in conjunction with other issues regarding stipulated facts* and agree that defendant's automatic admissions are deemed withdrawn and the
7 responses to Request to Admit No.'s 1-14, served on October 4, 2007, are deemed operative.

8 4. All parties have notice of this application and have stipulated to it.

9 5. It is respectfully requested that this Stipulation For an Order to Withdraw The
10 Motion of a Discovery Dispute And Stipulation For an Order That Defendant's Automatic
11 Admissions Are Deemed Withdrawn And The Responses to Request to Admit No.'s 1-14
12 Served On October 4, 2007 Are Deemed Operative be granted.

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28 **STIPULATION TO WITHDRAW THE MOTION OF A DISCOVERY DISPUTE AND STIPULATION FOR
ORDER THAT DEFENDANTS AUTOMATIC ADMISSIONS ARE DEEMED WITHDRAWN AND THE
RESPONSES TO REQUEST TO ADMIT NO.'S 1-14 SERVED ON OCTOBER 4, 2007 ARE DEEMED
OPERATIVE.**

6. It is also stipulated that in considering the pending Motion For Summary Judgment, Or In the Alternative, Summary Adjudication of Issues, that Request to Admit No.'s 1, 2, 3, 5, 6, 7 and 8 were admitted by the defendant and Request to Admit No.'s 4, 9, 10, 11, 12, 13 and 14 were denied by the defendant in the defendant's October 4, 2007, Responses to Request For Admissions, Set One.

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: October 25, 2007

FOREMAN & BRASSO

By:

Ronald J. Foreman
Attorney for Defendant
MICHAEL T. BLATT

Dated: October 25, 2007

STIPULATED TO:

KRING & CHUNG, LLP

By:

Ronald J. Skocypek, C
J. Christopher Bennington
Attorney for Plaintiff
LIBERTY MUTUAL
INSURANCE COMPANY

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STIPULATION TO WITHDRAW THE MOTION OF A DISCOVERY DISPUTE AND STIPULATION FOR ORDER THAT DEFENDANTS AUTOMATIC ADMISSIONS ARE DEEMED WITHDRAWN AND THE RESPONSES TO REQUEST TO ADMIT NO.'S 1-14 SERVED ON OCTOBER 4, 2007 ARE DEEMED OPERATIVE.